

## **EXHIBIT E**

**Topics of the July 11, 2006 30(b)(6) Deposition of Putnam:**

1. "The names . . . of all of Defendants' accounting systems;"
2. "The names . . . of all of Defendants' accounting systems used to collect financial documents related to 12b-1 fees, management fees, costs, expenses, and revenues associated with the Funds;"
3. "The queries Defendants can or do perform, using Defendants' accounting systems or other technology, to collect data related to 12b-1 fees, management fees, costs, expenses, and revenues associated with the Funds;"
4. "Litigation response policies, including any response if given notice of a duty to preserve data contained in Defendants' accounting systems;"
5. "The manner in which journals or subledgers and general ledgers for the Funds are constructed from the data input into the accounting systems;"
6. "The manner in which journals or subledgers and general ledgers for Defendants are constructed from the data input into the accounting systems;"
7. "The manner in which revenues, costs and expenses of the Funds are input into the accounting systems;"
8. "The manner in which Defendants' revenues, costs and expenses are allocated across the Funds;"
9. "The manner in which Funds' revenues, costs and expenses contained in journals, subledgers, general ledgers and trial balances are input into the financial statements of the Funds;"
10. "The manner in which Defendants' revenues, costs and expenses contained in journals, subledgers, general ledgers and trial balances are consolidated into the financial statements of Defendants;"
11. "The manner in which Defendants differentiate between the costs, expenses and revenues attributable to the Funds and the costs, expenses and revenues that are not attributable to the Funds;"
12. "The identity, nature and regular content of any periodic financial reports related to Defendants and the Funds, the source of the data in each of the line items contained in such reports, and the manner in which one could obtain a more detailed accounting of each of the line items contained within such reports;"
13. "The identity of chief accounting officers, chief financial officers, corporate comptrollers, and/or other officers responsible for supervising accounting for the Funds;"

**Topics of the October 16, 2006 30(b)(6) Deposition of Putnam:**

1. "The meaning of and assumptions underlying the Putnam-created documents in the black books and associated materials for 2002-2006, and for 1995-2006 as to information therein addressing (i) economies of scale and (ii) black book Tab 18 and its prior-year equivalents;"
2. "The process by which the black books and associated materials were prepared in 2002-2006;"

3. "The sources of the information contained in the black books and associated materials for 2002-2006, and for 1995-2006 as to (i) information therein addressing economies of scale and (ii) black book Tab 18/its prior year equivalents;"
4. "The identity of the person who prepared the black books and associated materials for 2002-2006, and the persons most knowledgeable as to the various parts of those materials;" and
5. "The process of determining the content of the black books and associated materials in 2002-2006, and in 1995-2006 as to (i) information therein addressing economies of scale and (ii) black book Tab 18/its prior-year equivalents."

**Topics of the February 27, 2007 30(b)(6) Deposition of Putnam:**

1. "The manner in which the documents produced at Bates number[s] 242029-30 [and 0254809-254810 were] prepared; the identity and job title of the person who prepared it; the meaning and sources of the information presented therein; and the authenticity and accuracy of the document."
2. "A precise description of each line item found in each line item found in each row of the document[s] produced at Bates number[s] 242029-30 [and 0254809-254810], including the services for which the revenue was received, whether such revenue was received under investment management agreements, and if not, the precise nature of the agreements under which such revenue was received."
3. "The portion of each line item marked with an asterisk in the document produced at Bates number 242029-30 which was attributed to the defined benefit or DB revenue and the portion attributed to international revenue."
4. "As to any line item that represents a debit from revenue, the reason why the revenue was debited, the nature of the services involved, whether such debit relates to an investment management agreement and, if not, the precise nature of any agreement related to the debit."
5. "The manner in which the documents produced at Bates number 231043 and 243710-12 were prepared; the identity and job title of the person who prepared them; the meaning and sources of the information presented therein; and the authenticity and accuracy of the documents."
6. "A precise description of each line item found in each row of the documents produced at Bates number 231043 and 243710-12, including the services it represents, whether those services were provided pursuant to an investment management agreements, and if not, the precise nature of the agreements under which the services were provided."
7. "A precise description of nature of the assets reflected in the figures provided in the documents produced at Bates number 231043 and 243710-12, including the services that were performed for such assets, whether those services were performed pursuant to an investment management agreements, and if not, the precise nature of the agreements under which the services were performed."
8. "The reasons for any discrepancy between the figures provided in Bates number 231043 versus the figures provided in Bates number 243710-12."
9. "[T]he descriptions contained at Putnam-Wicks 0254811-13."